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6 PINOLEVILLE POMO NATION, et al

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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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11 PINOLEVILLE POMO NATION,
12 PINOLEVILLE POMO NATION
13 ENVIRONMENTAL ASSOCIATION AND
LEONA WILLIAMS,

14 Plaintiffs,

15 v.

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17 UKIAH AUTO DISMANTLERS, WAYNE
HUNT ISABEL LEWRIGHT, WARRIOR
18 INDUSTRIES, INC., RICHARD MAYFIELD,
ROSS JUNIOR MAYFIELD, PAULA
19 MAYFIELD, KENNETH HUNT, U.S.
ALCHEMY CORPORATION AND DOES 1-
50, INCLUSIVE,

20

21 Defendants.

22 Case No.: C 07 2648

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24 **DECLARATION OF LEONA
WILLIAMS IN SUPPORT OF
PRELIMINARY INJUNCTION
IN RESPONSE TO RICK MAYFIELD
DECLARATION**

25 Date: 06/25/08
Time: 1:30 P.M.
Dept: Courtroom C, 15th Floor
Judge: Susan Illston

26 I, LEONA WILLIAMS, declare as follows:

27 1. I am the tribal chairperson for the Pinoleville Pomo Nation (PPN) and have served in
that capacity since 1994. I am and have been in charge of the Tribal Government since that time.
28 I have reviewed the declaration of Rick Mayfield and it is wrong in the following respects:

- 1 2. In paragraph 3, where it alleges that PPN placed automobiles in order to protect the
2 levees as part of the flood control project is wrong. PPN had nothing to do with this
3 action.
- 4 3. In paragraph 9, where it alleges that on behalf of PPN Rick Mayfield's company has
5 cleaned up trash such the "20 cars" is not true. The same can be said of the
6 "chemicals of open drums" as he alleges in his declaration.
- 7 4. In paragraph 19, where it alleges that "We also have been actively working to keep
8 the entire rancheria property clean, as it is in our best interest to do so" is false.
- 9 5. In paragraph 20, where it alleges that Rick Mayfield tried to be a good neighbor to
10 PPN implying that he done it out of the kindness of his heart is also false. The truth is
11 the tribe has given thousands and thousands of dollars in sales tax exemption in
12 return. The exact amount cannot be readily determined without extensive of official
13 records.
- 14 6. The suggestion by Mr. Mayfield that PPN owes him \$15,000.00 or any sum is
15 blatantly false.

16 I declare under the penalty of perjury that the foregoing is true and correct except to those
17 matters based on information and belief, and to those I believe them to be true. Executed
18 in Ukiah, California.

19 Dated: June 18, 2008

20 /S/ Leona Williams

21 The Honorable Leona Williams

22 Chairperson, Pinoleville Pomo Nation